

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Mikayla Cheyenne Savage

Plaintiff,

vs.

Harris County, Texas, et al.

Defendants.

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Case No. H-4:24-cv-00666

**DECLARATION OF KARLEY BUCKLEY IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO MOTION TO QUASH**

I, Karley Buckley, hereby declare as follows:

1. I am employed by the law firm DLA Piper LLP (US), counsel of record for Plaintiff Mikayla Savage in this action. I am familiar with the facts set forth herein and submit this declaration in support of Plaintiff's Opposition to Harris County's Third Motion to Quash.

2. On March 31, 2025, Plaintiff's counsel provided notice to all Defendants who have appeared in this action of Plaintiff's intent to serve the Subpoena on Harris County. A true and correct copy of that communication is attached hereto as Exhibit A.

3. Counsel for Harris County refused to accept service of the Subpoena via email.

4. On May 7, Plaintiff properly served the Subpoena on Harris County via personal service on Judge Lina Hidalgo's office. A true and correct copy of the affidavit of service is attached hereto as Exhibit B.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: June 2, 2025

/s/ Karley T. Buckley
Karley T. Buckley

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document has been served electronically via the Court's CM/ECF system on June 2, 2025 on all counsel of record.

/s/ Karley T. Buckley
Karley T. Buckley

Exhibit A

Buckley, Karley

From: Buckley, Karley
Sent: Monday, March 31, 2025 10:20 PM
To: Burnett, Greg (CAO; Copeland, Kelsie (CAO; Lancelin-Curb, Michelle (CAO; Burnett, Greg (CAO; Fraser, Rachel (CAO; Jones, Veronica (CAO; Butt, James (CAO)
Cc: Bamberger, David; Miriam Nemeth; D Danganaran; Canoni, John; Hoffner, Kaylee; Reed, Taylor
Subject: Mikayla Savage v. Harris County et al - Case No. 24-cv-00666
Attachments: 2025.03.31 Savage Notice of Subpoena to Harris County.pdf

Dear Counsel,

Attached for service please find a notice of intent to serve subpoena on non-party Harris County.

Best,
Karley

Karley T. Buckley
Associate

T +1 713 425 8421
F +1 713 300 6021
M +1 760 315 1509
karley.buckley@us.dlapiper.com

DLA Piper LLP (US)
845 Texas Avenue
Suite 3800
Houston, TX 77002-2946



[dlapiper.com](https://www.dlapiper.com)

Exhibit B

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Texas



Mikayla Cheyenne Savage

Plaintiff

v.

Harris County, Texas, et al.

Defendant

Civil Action No. 4:24-cv-00666

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Harris County, Texas, c/o Lina Hidalgo, Harris County Judge, 1001 Preston Street, Houston, Texas 77002

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Attachment A

Place: DLA Piper LLP (US)
845 Texas Avenue, Suite 2800
Houston, Texas 77002

Date and Time:

May 15, 2025 @ 10:00 a.m. CT

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: May 1, 2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Plaintiff Mikayla Cheyenne Savage, who issues or requests this subpoena, are:
DLA Piper LLP (US), Karley Buckley, 845 Texas Avenue, Suite 2800, Houston, Texas 77002, (713) 425-8421,
karley.buckley@us.dlapiper.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 4:24-CV-00666

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* HARRIS COUNTY By delivering to County Judge, LINA HIDALGO on *(date)* May 2, 2025.

☒ I served the subpoena by delivering a copy to the named individual as follows: Served to Kathryn Kase who is legal counsel in Judge Hidalgo's office. on (date) Wed, May 07 2025 at 1:51 pm CDT

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: 05/09/2025

Zachary Thibodeaux

Server's signature

Zachary Thibodeaux PSC# 13486 Exp 2/28/2026

Printed name and title

1419 MONTROSE BLVD UNIT 702, HOUSTON, TX 77019

Server's address

Additional information regarding attempted service, etc.:

1) Unsuccessful Attempt: May 2, 2025, 1:01 pm CDT at 1001 PRESTON STREET, HOUSTON, TX 77002
The office is getting new carpet so everyone is working remote today. She said they will be back Monday.

2) Unsuccessful Attempt: May 6, 2025, 11:18 am CDT at 1001 PRESTON STREET, HOUSTON, TX 77002
Kathryn Kase was not in the office yesterday, I went up there today and was told she is still out sick and they expect her back tomorrow. They gave me a card with a link and said they could be served an alternative way through the website if the client would prefer. <https://cjo.harriscountytexas.gov/Contact/Inquiries-Legal-Ceremonial-Documents>

Let me know if they prefer to do it that way or if they want me to come back tomorrow and serve them in person.

3) Successful Attempt: May 7, 2025, 1:51 pm CDT at 1001 PRESTON STREET, HOUSTON, TX 77002 received by HARRIS COUNTY By delivering to County Judge, LINA HIDALGO.
Served to Kathryn Kase who is legal counsel in Judge Hidalgo's office.